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April 30, 2021

VIA ECF

Honorable Loretta A. Preska
U.S. District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Donziger, 19 Cr. 561 (LAP); [11 Civ. 691 (LAK)]

Dear Judge Preska:

I represent the United States and write in response to the Court's April 30, 2021 order directing counsel to "confer and propose a briefing schedule. . .no later than April 30 at 6:00 p.m." for "Defendant Steven Donziger's recently filed motion for reconsideration and motion to dismiss." Dkt. 276.

We have conferred and the parties propose the following briefing schedule: the Special Prosecutor's response to the motion filed by Tuesday, May 4, 2021, and the defense's reply filed by Thursday, May 6, 2021.

Respectfully submitted,

_____/s/_____
Rita M. Glavin

*Special Prosecutor on behalf
of the United States*